

Title:

Mr

Forename:

Robert

Surname:

Clegg

Representing:

Organisation

Organisation (if applicable):

Ventura

Email:

Robert.Clegg@Ventura-uk.com

What do you want Ofcom to keep confidential?:

Keep nothing confidential

If you want part of your response kept confidential, which parts?:

Ofcom may publish a response summary:

Yes

I confirm that I have read the declaration:

Yes

Ofcom should only publish this response after the consultation has ended:

You may publish my response on receipt

Additional comments:

Question 1: Do you agree that Ofcom should limit the number of times a company can call an answer machine without guaranteeing the presence of a live operator to once every 24 hours?:

No, this change will have a significant commercial impact to our business for the following reasons:

- it will not suit certain types of services such as certain customer service calls, debt collections and credit card fraud. In such circumstances, it is necessary to make repeated attempts to a customer within a short period of time, i.e. 24 hours. If such calls have to be passed to agents in each instance to avoid the 24 hour answer machine rule then the provision of such services may become financially unfeasible to our clients because the length of campaigns would increase, which would have a direct time/cost implication for our clients. If the issue is with AMD silent calls then we would suggest playing a message to the customer in the same way a message is played when an abandon call occurs; and

- it could also force companies to be more aggressive with their dialing on other outcomes in order to achieve the same performance.

Question 2: Do you agree with Ofcom that a two month implementation period (from publication of Ofcom's revised statement) would be an appropriate length of time for industry stakeholders to adopt any changes to comply with the proposed 24 hour policy?:

If the change was implemented we suggest that 3 months is a more appropriate implementation period because this would give companies time to not only amend their dialler strategies to account for the change but also identify and recruit the additional staff required to maintain performance levels.

Question 3: Has Ofcom provided sufficient clarity on how the abandoned call rate is to be calculated?:

Yes, although I would question why abandon calls to answer machines are removed from the abandon call rate when AMD is switched off and not when it is switched on. The calls occur regardless so the calculation should be the same.

Question 4: Do you agree with the factors set out by Ofcom for determining a reasoned estimate of AMD false positives in an ACS user's abandoned call rate?:

Yes.

Question 5: Has Ofcom provided sufficient clarity on how AMD users should calculate an abandoned call rate that includes a reasoned estimate of AMD false positives?:

Yes, although I would question why abandon calls to answer machines are removed from the abandon call rate when AMD is switched off and not when it is switched on. The calls occur regardless so the calculation should be the same.

Question 6: Has Ofcom provided sufficient clarity on how non-AMD users should calculate an abandoned call rate that includes an estimate of abandoned calls picked up by answer machines? :

Question 7: Do you agree that Ofcom should not amend the existing two second policy as set out in the 2009 Amendment from 'start of salutation' to 'end of salutation'?:

No, we believe that the two second policy should start from the 'end of salutation' because this works better for both consumers and the industry.

Question 8: Do you agree with Ofcom's policy proposal that companies provide a geographic contact number (01, 02 or 03) in addition to a freephone (080) number in the information message provided in the event of an abandoned call?:

This has minimal impact to the industry so we are not concerned with this change.

Question 9: Has Ofcom provided sufficient clarity on what constitutes a 'campaign'?:

Yes.